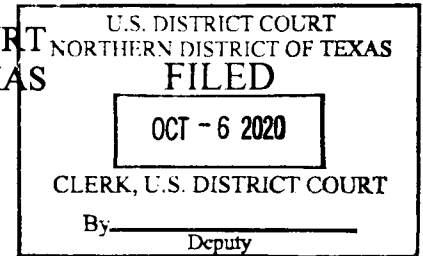


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:20-MJ-676-BJ

MARY JANE MCINTYRE (01)

CRIMINAL COMPLAINT

I, Postal Inspector Thomas Halsell, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about October 6, 2020, in the Fort Worth Division of the Northern District of Texas, defendant **Mary Jane McIntyre** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

1. Your Affiant, Thomas Halsell, is currently employed as a U.S. Postal Inspector with the United States Postal Inspection Service and has been so employed for the past 14 years. I am currently assigned to the Contraband Interdiction and Investigation (CI2) Team for the Fort Worth Division of the U.S. Postal Inspection Service. Part of my responsibilities as a member of the CI2 Team is the investigation of controlled substances transported through the U.S. Postal Service in violation of 21 U.S.C. §§ 841(a)(1), distribution of a controlled substance, and 843(b), use of the mails to facilitate or commit a drug trafficking crime, of The Drug Abuse Prevention and Control Act. I have participated in the interdiction of illegal drugs shipped via the U.S. Mail, and have

received training relative to criminal investigations and narcotics trafficking from the U. S. Postal Inspection Service.

2. It is my belief that **Mary Jane McIntyre** conspired with others to possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841.

3. Since this affidavit is submitted only for the limited purpose of securing a criminal complaint, I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient in establishing probable cause for the complaint sought. The facts in this affidavit are based on, among other things, my review of evidence and discussions with other law enforcement officers.

PROBABLE CAUSE

4. On or about October 6, 2020, Postal Inspectors and Special Agents with the U.S. Postal Service Office of Inspector General (USPS-OIG) executed a federal search warrant at **McIntyre's** residence on Savannah Club Drive in Arlington, Tarrant County, Texas.

5. During the execution of the search warrant, Postal Inspectors recovered several vacuum-sealed bags containing bulk quantities of a crystalline substance, which field tested positive for methamphetamine. Along with the methamphetamine, agents recovered quantities of small vacuum-sealed packages marked with 3.5 and 7 in red marker on the exterior of the bag, this is consistent with narcotics packages recovered during the investigation. Also found in the residence were USPS shipping supplies

including Priority Mail envelopes, Priority Mail Small Flat Rate boxes, manila envelopes, suspected marijuana, blank DVD cases, and rolls of vacuum seal bags. Postal Inspectors also recovered envelopes with approximately \$23,000 or more in U.S. currency hid behind several pictures on the walls of the apartment.

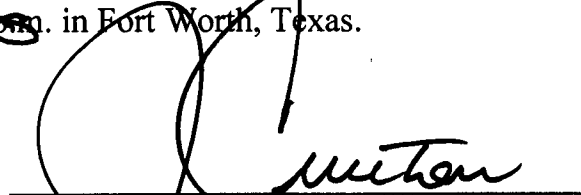
6. On prior occasions, **McIntyre** has been captured on Post Office surveillance cameras mailing parcels for her son, who is a known narcotics distributor.

7. Based upon the foregoing facts and information, I respectfully submit that there is probable cause to believe that **Mary Jane McIntyre** did possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841.



T. Halsell
Postal Inspector
U.S. Postal Inspection Service

Sworn to before me, and subscribed in my presence on this 6th day of October 2020, at 1:58 a.m./p.m. in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE